

# THE BAUER LAW FIRM

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PENNSYLVANIA 19103

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A T T O R N E Y S

**C. Theresa Barone**

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August 31, 2010

Clerk of Court  
United States District Court  
Eastern District of Pennsylvania  
601 Market Street, Room 2609  
Philadelphia, PA 19106

**RE: Villa v. FAMOUS SMOKE SHOP-PA INC et al.**

Dear Sir/Madam:

Please find enclosed an original and one (1) copy of a Complaint to be filed with the Court regarding the above matter. Kindly file the original of record and return a time-stamped copy to me using the enclosed self addressed stamped envelope. I have also enclosed a CD-ROM containing a copy of the Complaint and Exhibit A. Also enclosed herein is a check in the sum of \$350.00 representing the filing fee.

Should you have any questions please contact me. Thank you for your courtesies.

Very truly yours,

THE BAUER LAW FIRM, P.C.

By:

  
C. Theresa Barone

CTB/klc  
Enclosure

**Philadelphia**  
1600 Market Street, Fifth Floor  
Philadelphia, PA 19103  
(215) 569-9990

**Leigh Valley**  
461 Linden Street  
Allentown, PA 18102  
(610) 437-0100

**Lancaster**  
18 East King Street  
Lancaster, PA 17602  
(717)295-5383

**Reading**  
538 Elm Street  
Reading, PA 19601  
(610) 372-2666

**Lebanon**  
410 Chestnut Street  
Lebanon, PA 17042  
(717) 272-0020

JS 44 (Rev. 12/07)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

Yvette Villa

(b) County of Residence of First Listed Plaintiff Northampton County  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

The Bauer Law Firm, 200 Four Falls Corporate Center, Suite 312,  
Conshohocken, PA 19428 P) 484-222-2468

**DEFENDANTS**

FAMOUS SMOKE SHOP-PA INC and  
FAMOUS SMOKE SHOP-PA., INC.

County of Residence of First Listed Defendant Northampton County and  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Recopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
28 U.S.C. Section 1391 (b)

Brief description of cause:

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

100,000

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

8/31/10

SIGNATURE OF ATTORNEY OF RECORD

[Signature]

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

**FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.**Address of Plaintiff: 510 Broadway, Bethlehem, PA 18015Address of Defendant: 1100 Conroy Place, Easton, PA 18040 and 1903 West Main St., Stoudsburg, PA 18360Place of Accident, Incident or Transaction: 1100 Conroy Place, Easton, PA 18040  
(Use Reverse Side For Additional Space)Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?  
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☒Does this case involve multidistrict litigation possibilities? Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

## A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☒ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☐ All other Federal Question Cases  
(Please specify)

## B. Diversity Jurisdiction Cases:

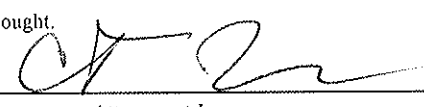
1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases  
(Please specify)

**ARBITRATION CERTIFICATION**

(Check Appropriate Category)

I, Catherine Theresa Barone, Esquire, counsel of record do hereby certify:

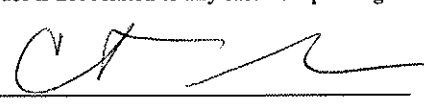
- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE: August 27, 2010  
Attorney-at-Law90940

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: August 27, 2010  
Attorney-at-Law90940

Attorney I.D.#

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

Yvette Villa	:	CIVIL ACTION
	:	
v.	:	
	:	
FAMOUS SMOKE SHOP-PA INC and	:	
FAMOUS SMOKE SHOP-PA., INC.	:	NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ☒
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ( )

<u>August 27, 2010</u>	<u>Catherine Theresa Barone, Esq.</u>	<u>Plaintiff</u>
<b>Date</b>	<b>Attorney-at-law</b>	<b>Attorney for</b>
<u>484-222-2468</u>	<u>484-222-2500</u>	<u>Tbarone@abslawfirm.com</u>
<b>Telephone</b>	<b>FAX Number</b>	<b>E-Mail Address</b>

**(Civ. 660) 10/02**



**THE BAUER LAW FIRM**  
**BY: CATHERINE THERESA BARONE, ESQUIRE**  
**ATTORNEY I.D.#: PA90940**  
**200 FOUR FALLS CORPORATE CENTER**  
**SUITE 312**  
**WEST CONSHOHOCKEN, PA 19428**  
**(484) 222-2468**

**ATTORNEY FOR PLAINTIFF**

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**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

**YVETTE VILLA**  
**510 Broadway**  
**Bethlehem, PA 18015**

**Plaintiff**

**v.**

**FAMOUS SMOKE SHOP-PA INC**  
**1100 Conroy Place**  
**Easton, PA 18040**

**and**

**FAMOUS SMOKE SHOP-PA., INC.**  
**1903 West Main St**  
**Stroudsburg, PA 18360**

**Defendant**

**No:**

**JURY TRIAL DEMANDED**

**J.**

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**COMPLAINT - CIVIL ACTION**

1. Plaintiff, Yvette Villa, is an adult individual who resides at 510 Broadway, Bethlehem, Northampton County, Pennsylvania 18015.

2. Defendant, FAMOUS SMOKE SHOP-PA INC is a corporation organized under the laws of the Commonwealth of Pennsylvania and with a registered office address of 1100 Conroy Place, Easton, Northampton County, Pennsylvania 18040.

3. Defendant, FAMOUS SMOKE SHOP-PA., INC. is a corporation organized under

the laws of the Commonwealth of Pennsylvania and with a registered office address of 1903 West Main Street, Stroudsburg, Monroe County, Pennsylvania 18360.

4. Hereinafter, Defendants (FAMOUS SMOKE SHOP-PA, INC. and FAMOUS SMOKE SHOP-PA, INC.) will be referred to collectively and individually as “Defendant.”

### **JURISDICTION AND VENUE**

5. This court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. 1331, as this claim arises in part from Title VII of the Civil Rights Act of 1964 (Title VII) and the Civil Rights Act of 1991.

6. The Eastern District of Pennsylvania is the proper venue for this action pursuant to 28 U.S.C. § 1391(b) as Plaintiff resides in this judicial district and one (1) Defendant has offices and does business in this judicial district.

### **FACTS**

7. Plaintiff is female.

8. Plaintiff began to work for Defendant in 2001 and worked for Defendant until approximately October 2006.

9. Plaintiff was laid off following a medical leave but was rehired by the Defendant on February 18, 2008.

10. Following her rehiring, the Defendant’s owner, Arthur Zaretsky began to engage in inappropriate sexual comments and to approach Plaintiff, through innuendo, comments and behavior, for sexual favors.

11. Plaintiff suffered the harassing behavior for several months until, in approximately September 2008, she made a complaint to Defendant’s human resources department.

12. Plaintiff was pressured into signing a paper giving up her claim of sexual harassment against the owner of the company in order to retain her job.

13. Following the complaint, Plaintiff was subject to disciplinary action for alleged infractions of company policy. Others who had not complained of harassment were not similarly disciplined.

14. On January 22, 2009, Plaintiff was laid off from her position. Others with less seniority and lower sales margins but who had not complained of sexual harassment were retained by the Defendant.

15. Plaintiff believes, and therefore avers, that her termination was motivated by her complaints of sexual harassment and was, accordingly, in violation of laws against such discrimination and retaliation.

16. As a result of this discriminatory and retaliatory treatment, Plaintiff has suffered severe emotional distress, financial and other losses.

17. Plaintiff believes and therefore avers that the discriminatory and retaliatory conduct engaged in by the Defendant is intentional and that, therefore, punitive damages are appropriate.

18. Plaintiff filed complaints with the Equal Employment Opportunity Commission and Pennsylvania Human Relations Commission and has received a Notice of Right to Sue. *Exhibit A*

**COUNT ONE  
VIOLATION OF FEDERAL CIVIL RIGHTS ACTS OF 1964 AND 1991**

19. Plaintiff incorporates the allegations of paragraphs 1-18 above as if set forth at length herein.

20. Defendant employs more than fifteen employees and therefore is an employer as defined by the Acts.

21. As set forth above, Defendant has harassed and discriminated against the Plaintiff with respect to her compensation, terms, conditions, and/or privileges of employment, because of her sex.

22. As set forth above, Defendant has retaliated against the Plaintiff for the charges of discrimination and harassment she has brought against it.

23. Plaintiff brought charges of discrimination against the Defendant at the Pennsylvania Relations Commission and Equal Employment Opportunity Commission and has received a right-to-sue letter.

24. As set forth above, Plaintiff incurred damages as a result of the conduct of the Defendant, including but not limited to severe emotional distress, financial and other losses, as well as costs of suit and attorney's fees.

25. As set forth above, Plaintiff believes and therefore avers that the conduct of the Defendant is intentional, thus giving rise to punitive damages.

WHEREFORE, Plaintiff requests that this Honorable Court find in her favor and against the Defendant, FAMOUS SMOKE SHOP-PA INC and FAMOUS SMOKE SHOP-PA., INC. and award all damages cognizable under the Federal laws against discrimination, including compensation for actual monetary losses, for future monetary losses, and for mental anguish and inconvenience, as well as interest, attorney's costs and fees, and injunctive relief.

**COUNT TWO**  
**VIOLATION OF THE PENNSYLVANIA HUMAN RELATIONS ACT**

26. Plaintiff incorporates the allegations of paragraphs 1-25 above as if set forth at length herein.



27. Defendant employs more than four employees and therefore is an employer as defined by the Act.

28. As set forth above, Defendant has harassed discriminated against the Plaintiff with respect to her compensation, terms, conditions, and/or privileges of employment, because of her sex.

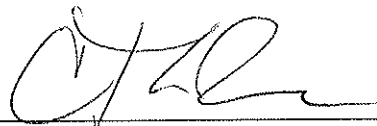
29. As set forth above, Defendant has retaliated against the Plaintiff for the charges of harassment and discrimination she has brought against it.

30. Plaintiff brought charges of discrimination against the Defendant at the Pennsylvania Relations Commission and Equal Employment Opportunity Commission and has received a right-to-sue letter.

31. As set forth above, Plaintiff incurred damages as a result of the conduct of the Defendant, including but not limited to severe emotional distress, financial and other losses, as well as costs of suit and attorney's fees.

WHEREFORE, Plaintiff requests that this Honorable Court find in her favor and against the Defendant, FAMOUS SMOKE SHOP-PA INC and FAMOUS SMOKE SHOP-PA., INC and award all damages cognizable under the Federal laws against discrimination, including compensation for actual monetary losses, for future monetary losses, and for mental anguish and inconvenience, as well as interest, attorney's costs and fees, and injunctive relief.

THE BAUER LAW FIRM



Catherine Theresa Barone  
Attorney for the Plaintiff  
200 Four Falls Corporate Center  
Suite 312  
West Conshohocken, PA 19428  
(484) 222-2468  
Fax (484) 222-2500

Exhibit A

Chairperson  
STEPHEN A. GLASSMAN  
Vice Chairperson  
RAQUEL O. YIENGST  
Secretary  
DANIEL D. YUN  
Assistant Secretary  
REV. DR. JAMES EARL GARMON, SR.  
Executive Director  
HOMER C. FLOYD



Commissioners  
ISMAEL ARCELAY  
M. JOEL BOLSTEIN  
J. WHYATT MONDESIRE  
S. KWEILIN NASSAR  
GERALD S. ROBINSON  
SYLVIA A. WATERS  
DANIEL L. WOODALL, JR.

**COMMONWEALTH OF PENNSYLVANIA**  
**Human Relations Commission**  
**301 Chestnut, Suite 300**  
**Harrisburg, PA 17101-2702**  
**(717) 787-4410 voice**  
**(717) 787-4087 TTY**  
**[www.phrc.state.pa.us](http://www.phrc.state.pa.us)**

July 14, 2010

Yvette Villa  
1133 Fairy Street, Apartment 1  
Easton PA 18042

RE: Yvette Villa v Famous Smoke Shop PA Inc  
Case No. 200806632  
EEOC No. 17F200962618

Dear Yvette Villa:

It has been one year since you filed your complaint with the Pennsylvania Human Relations Commission. This is to notify you that you now have the right to bring an action in the appropriate Pennsylvania Court of Common Pleas based on the alleged violations of the PHRA contained in your Commission complaint. This right is provided under Section 12(c) of the Human Relations Act, 43, P.S. § 962(c).

Please be advised that you are not required to file such an action in the State Court of Common Pleas. The Commission is continuing to process your case, and we will make every effort to resolve it as soon as possible. If we are not notified otherwise, we will assume that you want the Commission to continue handling your case.

If you do file a complaint in a Court of Common Pleas, the Commission will dismiss your complaint. This means that you will be unable to have the Commission decide your case even if your complaint is dismissed in State Court because of a procedural error. Procedural errors may include filing the complaint in State Court in the wrong county or filing in State Court after your time to file has expired. For this reason, you should make every effort to assure that any complaint you file in State Court will be properly filed before you file it.

If you believe you might want to take your case to State Court, we suggest that you consult a private attorney about representing you in that action. This should be done before you file the complaint so that your attorney may advise you on the best course of action for you to take.

Should you file a complaint in State Court, you are required by Section 12(c)(2) of the Pennsylvania Human Relations Act to serve the Human Relations Commission with a copy of the Court complaint. This copy must be served on the Commission at the same time you file it in Court. The copy is to be sent to:

Michael Hardiman, Chief Counsel - Pennsylvania Human Relations Commission  
301 Chestnut Street - Suite 300 P.O. Box 3145  
Harrisburg, PA 17105-3145

If you have any questions concerning this matter, please feel free to contact the investigator who is handling your case.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Arberdella White-Davis".

Arberdella White-Davis  
Director of Compliance  
AWD: lap  
cc: Theresa Barone, Esq